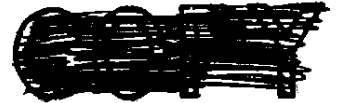


DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

WASHINGTON, D.C.

SCOTT S. PATRICK
DIRECT DIAL 202-776-2885
spatrick@dowlohn.com

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-4885
www.dowlohn.com



ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

November 8, 2002

RECEIVED

NOV - 8 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attention: Video Division
Media Bureau

Re: WSPX-TV (Syracuse, New York)
Facility I.D. No 64352
Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Paxson Syracuse License, Inc., licensee of commercial television station WSPX-TV, Syracuse, New York, we hereby transmit an original and four copies of a *Petition for Rule Making* proposing a new digital channel pursuant to the Commission's rules and policies.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,

Scott S. Patrick

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

NOV - 8 2002

In the Matter of)
)
Amendment of Section 73.606(b))
Table of Allotments,)
Television Broadcast Stations)
(Bath, New York))
)
Amendment of Section 73.622(b))
DTV Table of Allotments)
Digital Television Broadcast Stations)
(Syracuse, New York))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. _____
RM- _____

To: Chief, Allocations Branch
Policy and Rules Division
Media Bureau

PETITION FOR RULE MAKING TO AMEND
THE TV AND DTV TABLE OF ALLOTMENTS

Paxson Syracuse License, Inc. ("Paxson"), licensee of commercial television station WSPX-TV serving Syracuse, New York (the "Station"), by its attorneys and pursuant to Section 1.401 of the Commission's Rules,¹ hereby respectfully petitions the Commission to institute a rulemaking to amend Sections 73.606(b) and 73.622(b), the TV and DTV Tables of Allotments, by reallocating Channel 14, Bath, New York, from the TV Table of Allotments to the DTV Table as an additional allotment for Syracuse, New York. Specifically, the TV Table of Allotments would be amended as follows:

	<u>Present</u>	<u>Proposed</u>
Bath, New York	14-	--

¹ 47 C.F.R. § 1.401

The DTV Table of allotments also would be amended as:

	<u>Present</u>	<u>Proposed</u>
Syracuse, New York	17, 19, 25c, 44c, 47, 54	14, 17, 19, 25c, 44c, 47, 54

The amendment is requested so that the Station can receive **an** in-core, paired channel for digital operation, thereby permitting full participation in the Commission's implementation of digital television. Channel 14 is the only in-core allotment currently available that would allow the Station to operate digital facilities from its authorized tower site consistent with the Commission's technical rules.² As the attached technical exhibit demonstrates, the Station's digital operations on Channel 14 would not impermissibly impact any existing TV or DTV service. In addition, the Station is not predicted to cause interference to any protected Class A or land-mobile service.

By reallocating Channel 14 to the DTV Table of Allotments, a fifteen-year old application for a new NTSC station in Bath, New York would be left without an allotment.³ Consistent with the Commission's past practices and its policy of facilitating the DTV transition, however, the Commission should give priority to the Station's proposed digital operations. Because existing viewers of WSPX-TV would avoid losing service during the DTV transition, and because viewers of existing, relied-upon service would not be impermissibly impacted, allotting DTV Channel 14 to Syracuse would be in the public interest.

² Because the Commission would allow the Station to "flash-cut" to digital on its assigned allotment, the proposed allotment should be treated under the evaluative criteria set forth in Section 73.622(c) of the Commission's rules. **As** the attached Technical Exhibit shows, *except* with regard to the facilities proposed in the long-standing "Bath Application" (*see infra* note 3), the proposed operations on Channel 14 comply fully with the Commission's requirements. The proposed operations also will comply with the Commission's principal community coverage rules outlined in Section 73.625(a) of the Commission's rules.

I. THE NEW DTV ALLOTMENT WOULD ALLOW THE STATION TO FACILITATE AND PARTICIPATE IN THE DIGITAL TRANSITION.

The Commission granted the initial construction permit for WSPX-TV on April 21, 1997 – too late for the Station to be initially assigned a paired DTV allotment.⁴ Under the rules and policies governing the conversion to DTV, the Station, which has been on-the-air since 1998, is allowed to continue operating in analog on its single allotment until no later than the close of the DTV transition. At some point, the Station will be allowed to “flash-cut” to digital. This approach necessarily prevents WSPX-TV from participating fully in the digital transition – a problem exacerbated by the Station’s assigned out-of-core allotment. Accordingly, Paxson is requesting that the Commission assign the “in-core” Channel **14** allotment as the Station’s paired DTV channel

Following Congressional directive, the Commission stated when it issued the DTV Table that it initially would assign paired allotments only to those stations which either were on-the-air or held a construction permit.⁵ At that time, the Commission envisioned a highly accelerated DTV transition and accordingly adopted implementation policies designed to facilitate a rapid

³ FCC File No. BPCT-19870331LW (the “Bath Application”)

⁴ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Sixth Report and Order*, 12 FCC Rcd 14588, ¶¶ 8-11 (1997) (describing stations initially eligible for DTV channel allotments) (“*DTV Sixth Report and Order*”).

⁵ *DTV Sixth Report and Order*, ¶¶ 8-11; see also Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, *Second Memorandum Opinion And Order On Reconsideration Of The Fifth And Sixth Report And Orders*, 14 FCC Rcd 1348, ¶ 17 (1998) (“*Second MO&O*”). Congress restricted “*initial eligibility*” for DTV licenses to these stations. 47 U.S.C. § 336(a)(1) (emphasis added). Now more than five years later, it would be disingenuous to argue that the Congressional restriction on *initial* eligibility would prevent the assignment of a DTV allotment to WSPX-DT, especially in light of The Public Health, Security, and Bioterrorism Preparedness and Response Act of 2002, Pub. L. No. 107-188, 116 Stat. 594, enacted June 12, 2002 (the “*Bioterrorism Act*”) (see *infra* note 14).

transition.“ Indeed, Congress itself subsequently codified the Commission’s 2006 target date for ending the DTV transition.’ Thus, in 1997, the decision to leave certain stations without a paired allotment during an expectedly short transition period was not considered debilitating to single-channel broadcasters.

This is no longer the case. The transition has been more operose and staggered than most anticipated. Questions, for example, about the robustness of the transmission format, the security of digital content, and the interoperability of cable and consumer electronic equipment have hindered the transition.⁸ Even as the pace of the transition has slowed, however, spectrum recovery for public safety services – always a significant element of the Commission’s DTV policies – has become even more important as a result of the attacks of 9/11, further compelling the need for a rapid transition. In response, the Commission, hoping to accelerate market penetration and facilitate the close of the transition, embraced more aggressive policies to place

⁶ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Fifth Report and Order*, 12 FCC Rcd 12809, ¶¶ 6 (“The more quickly that broadcasters and consumers move to digital, the more rapidly spectrum can be recovered”), 37 (explaining that decision to allow broadcasters flexibility to broadcast non-high definition digital signal designed to facilitate “rapid transition”), 97 (“One of our overarching goals in this proceeding is the rapid establishment of successful digital broadcast services that will attract viewers from analog to DTV technology, so that the analog spectrum can be recovered”) (1997) (“*Fifth Report and Order*”).

⁷ The Balanced Budget Act of 1997 added a new Section 309(j)(14) to the Communications Act. That section states that “[a] broadcast license that authorizes analog television service may not be renewed to authorize such service for a period that extends beyond December 31, 2006” unless the Commission grants an extension based on specific enumerated criteria. 47 U.S.C. Sec. 309(j)(14). See also *Fifth Report and Order*, ¶ 99 (setting 2006 target date for return of analog spectrum)

⁸ See, e.g., Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television, *Report and Order*, 16 FCC Rcd 5946, ¶¶ 98-105 (2001); Digital Broadcast Copy Protection, *Notice of Proposed Rulemaking*, MB Docket No. 02-230, FCC 02-231, ¶¶ 3-9 (rel. Aug. 9, 2002); Compatibility Between Cable Systems And Consumer Electronics Equipment, *Report and Order*, 15 FCC Rcd 17568 (2000).

DTV stations into operation as quickly as possible.’ Congress responded as well. Concerned about the pace of the transition and the acceptance by consumers, Congress required the Commission to assign paired allotments upon request to a number of single-channel stations to promote “the orderly transition to digital television, and to promote the equitable allocation and use of digital channels.”¹⁰

It accordingly would be unreasonable at this time to continue to deny an available DTV allotment to a single-channel station such as WSPX-TV, especially when no relied-upon service would be impermissibly impacted by the allocation. Assignment of a new DTV allotment would allow the Station to become a full participant in DTV and generally would facilitate the implementation of digital television. DTV is critical to the future of all broadcasters, but especially to Paxson Communications Corporation (“PCC”), parent company of the Station’s licensee. PCC must construct more DTV stations than any other station owner and is well on its way to completing those efforts.” PCC also has been an active participant in the Commission’s efforts to clear the upper 700 MHz band for the introduction of new public safety and wireless

⁹ See Remedial Steps For Failure to Comply With Digital Television Construction Schedule; Requests For Extension of the October 5, 2001, Digital Television Construction Deadline, *Order And Notice Of Proposed Rulemaking*, 17 FCC Rcd 9962, ¶ 16 (2002) (adopting sanctions for failure to timely construct DTV stations); Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television, *Memorandum Opinion and Order on Reconsideration*, 16 FCC Rcd 20594, ¶¶ 34-36 (allowing DTV stations to commence operations at low power).

¹⁰ The Public Health, Security, and Bioterrorism Preparedness and Response Act of 2002, § 531(a), Pub. L. No. 107-188, 116 Stat. **594**, enacted June 12, 2002.

¹¹ Of the permitted, non-band-clearing stations owned by PCC and its subsidiaries, by November 1, 2002 PCC placed some 18 out of 28 stations into operation, or 64%, as compared to some 42% currently constructed nationwide (this percentage is taken from the FCC’s October 30, 2002 report, available at <http://www.fcc.gov/mb/video/files/dtvonairsum.html>).

services, an endeavor that the Commission has recognized would further the DTV transition.” Additionally, PCC has spearheaded efforts to introduce innovative digital services such as multicasting that promise to unlock to consumers the full potential of DTV.

Without a paired allotment, the Station is precluded from fully participating in the digital transition. It is not clear when the Station could or would commence DTV service – contrary to the Commission’s desire to place as many DTV stations into operation as possible. Rather than incentivizing consumers to purchase digital receivers or facilitating the return of analog spectrum, the Station would be forced to await a level of consumer equipment penetration that might justify abandoning its analog audience. Moreover, because it was assigned an out-of-core allotment, if the Station “flash-cuts” to digital on its single channel prior to the end of the transition, it would be forced to strand all frequency-dedicated equipment, further discouraging the commencement of digital service.

With a paired DTV allotment, the Station would ensure that existing service to viewers is preserved during the transition. Those viewers capable of receiving digital signals would receive the benefits of enhanced WSPX-DT programming. Viewers who have not purchased digital equipment would not be disenfranchised. Equally important, a new DTV allotment would increase the amount of digital content available to viewers, thereby creating additional incentive for consumers to purchase digital equipment and facilitate the recovery of spectrum. Also, a paired, in-core allotment would allow the Station to carry out an “orderly” transition to digital,

¹² Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission’s Rules Carriage of the Transmissions of Digital Television Broadcast Stations Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, *Order on Reconsideration of the Third Report and Order*, 16 FCC Rcd 21633,710 (2001).

consistent with Congressional wishes, and would avoid the need to identify and switch to an in-core allotment after the close of the DTV transition.¹³

Obviously, the Commission understands and has embraced the merits of paired allotments. To avoid service disruption and losses, the Commission initially assigned a second allotment for digital broadcasting purposes to each existing station¹⁴ – even at the expense of creating new interference to a significant number of stations.¹⁵ Congress, too, which initially restricted the assignment of paired allotments, has clearly identified the benefits of assigning paired allotments to single-channel broadcasters. Given the renewed urgency of facilitating the digital transition, assigning a DTV allotment to the Station would be in the public interest.

II. THE COMMISSION SHOULD PREFER RELIED-UPON SERVICES TO NEW ONES IN ASSIGNING DTV ALLOTMENTS.

Assigning a DTV allotment to the Station would require the Bath Applicant to amend the application and propose an alternative channel for the unpaired station. Paxson believes this aspect should not prevent the Commission from assigning a new DTV allotment to the Station. The public interest heavily favors the prompt construction of a new digital station rather than continuing to allow valuable spectrum to remain fallow. Moreover, the Commission in the past has manifestly preferred existing service over applications for new stations.

¹³ See *Bioterrorism Act*, § 531(a) (describing purpose of providing paired allotments to single-channel broadcasters as “promot[ing] the orderly transition to digital television”).

¹⁴ See Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Second Report and Order and Further Notice of Proposed Rulemaking*, 7 FCC Rcd 3340, ¶¶ 9-13 (1992) (setting forth eligibility criteria for paired digital allotments). See generally, *Sixth DTV Report and Order*, ¶ 11.

¹⁵ See Appendix B, *Sixth DTV Report and Order*.

A. The Allotment Change is Preferable to Further Delay in Placing Channel 14 into Service.

The Bath Application has been pending since filed in 1987, and the Channel 14 spectrum has remained fallow despite a tremendous spectrum shortage. In this environment, the public interest heavily favors the addition of a DTV allotment that will put Channel 14 to immediate productive use over further processing of the Bath Application, for which, even after fifteen years, there is no indication that grant is forthcoming. Moreover, the allotment change would not impermissibly impact any existing stations.

The Commission's past reluctance to consider requests for paired allotments was based on concern that creating paired allotments would deter new licensees and consequently impair a diversity of broadcast voices.¹⁶ Neither of these concerns is remedied by allowing Channel 14 to remain unused. Indeed, by allowing the Bath Application to be amended, grant of the allotment change does not have to result in the loss of the prospective service. Grant of the requested allotment change will, on the other hand, ensure that existing viewers of the Station would not lose service and would receive full DTV service more quickly."

B. The Commission in the Past Has Favored DTV Allotments for Existing Stations Over the Proposed Service of Unbuilt Stations.

Grant of the requested amendment also would be consistent with the Commission's practice of giving priority to existing stations' requests for digital channels over those of applicants for new stations. For example, in July 2000, PCC, as parent company of the surviving applicant for a new station in Mobile, Alabama, revised the application by proposing to change

¹⁶ See *Second MO&O*, ¶ 18.

¹⁷ As of September 25, 2002, no full power DTV stations, and only a single low-power station was serving the Syracuse community. See <http://www.fcc.gov/mb/video/files/dtvstas.html>; <http://www.fcc.gov/mb/video/files/dtvonair.html>.

the allotment to Channel 50.¹⁸ On November 24, 2000, however, the Commission issued a *Notice of Proposed Rule Making* to amend the DTV Table to substitute Channel 50 as the allotment for WFGX-DT in Ft. Walton Beach, Florida.¹⁹ The proposal in the NPRM was mutually exclusive with PCC's Mobile application. The Commission's staff, however, said that its policy would be to grant the DTV channel change, preferring existing service to the application for a new station in Mobile

The instant request is analogous to that of WFGX-TV. Like WFGX-TV, WSPX-TV's proposal faces the obstacle of a mutually exclusive application for a new station. Like WFGX-TV, WSPX-TV's request is designed to facilitate the near-term institution of digital service to its community of license. The result in this case should follow the preferences expressed in the WFGX-DT case. The Commission is bound by *Melody Music* and its progeny to treat similarly situated parties similarly.²⁰ Consistency with the Commission's past practices should lead to the allotment change for Syracuse, New York.

111. CONCLUSION

For all of these reasons, Paxson requests that the Commission institute a rulemaking proceeding to amend Sections 73.606(b) and 73.622(b) to substitute DTV Channel 14 at Syracuse, New York, for the current NTSC Channel 14- at Bath, New York. If the Commission grants this petition and modifies the TV and DTV Table of Allotments as requested, Paxson is

¹⁸ The application initially proposed operation on the allotted Channel 61, but the Commission prohibited the creation of new stations on Channels 60-69 and allowed applicants the opportunity to amend to propose a lower numbered channel. See Reallocation of Television Channels 60-69, 12 FCC Rcd 22953, ¶ 40 (1998); *Public Notice*, DA 99-2605 (Nov. 22, 1999).

¹⁹ Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Fort Walton Beach, Florida), MM Docket No. 00-233, *Notice of Proposed Rule Making*, DA 00-2595 (2000).

²⁰ *Melody Music, Inc. v. FCC*, 345 F.2d 730 (D.C. Cir. 1965)

committed to applying for and constructing a DTV station on Channel 14 at the earliest practical date

Respectfully Submitted,

PAXSON SYRACUSE LICENSE, INC.

By:

John R. Feore, Jr.

Scott S. Patrick

Jason E. Rademacher

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2000

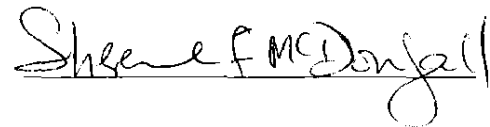
Dated: November 8, 2002

CERTIFICATE OF SERVICE

I, Sherene F. McDougall, hereby certify that a true and correct copy of the foregoing Reply Comments was sent on this **8th** day of November, **2002**, via First Class U.S. Mail, postage prepaid to the following:

A. Wray Fitch, III
Gammon & Grange, P.C.
Seventh Floor
8280 Greensboro Drive
McLean, VA 22102-3807

Counsel for William H. Walker III

A handwritten signature in black ink that reads "Sherene F. McDougall". The signature is written in a cursive style with a horizontal line underneath the name.

ATTACHMENT

TECHNICAL EXHIBIT

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULEMAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION WSPX-DT
SYRACUSE, NEW YORK

Technical Narrative

This Technical Exhibit has been prepared on behalf of television station WSPX-TV, analog channel 56, in Syracuse, New York. WSPX was not allotted a digital transition channel in the Memorandum Opinion and Order (MO&O) concerning reconsideration of the 6th Report and Order in MM Docket No. 87-268. Since WSPX-TV operates on out-of-core channel 56, it is seeking a new in-core channel for digital operation. A search of the core band (2-51) indicates that channel 14 is the best possible channel for digital use at the present location.

WSPX-DT channel 14 can be allotted to Syracuse in compliance with the principal community coverage requirements of Section 73.625(a) at the following reference coordinates:

43° 18' 18" North Latitude
76° 03' 00" West Longitude

These coordinates are the same as WSPX's current analog site. Operation on DTV channel 14 appears possible with an effective radiated **power** (ERP) of 125 kW utilizing a directional

antenna with a height above average terrain (HAAT) of 361 meters and a radiation center of 508.4 meters above mean sea level (AMSL).

Figure 1 is a coverage map showing the noise-limited coverage contour and the city coverage contour for the proposed facility. As shown all of Syracuse is encompassed within both contours (2000 Census).

Allocation Analysis

The proposed Rulemaking meets all of the minimum separation requirements to domestic stations and allotments, with the exception of a pending, channel 14 analog application at Bath, NY (BPCT-19870331LW) and station WPBS-TV, channel 16, Watertown, NY (BMLET-19910906KH). For consideration of the Bath application, see explanation attached elsewhere to this filing. With respect to WPBS-TV, pursuant to Section 73.623(c), it is calculated that less than 2 percent new interference will be caused by the proposed WSPX-DT allotment (see Figure 2).

Figure 2 provides a summary of interference and service for the proposed channel 14 allotment. Determination of interference and service was based on the procedures outlined in OET Bulletin No. 69 and criteria contained in Sections 73.622 and 73.623 of the FCC's rules. It is believed that the proposed channel 14 allotment is in full compliance with the FCC's 2 percent criterion for *de minimis* impact applicable to DTV allotment modifications under Section 73.623(c)(2). There are no spacing violations or contour overlap to Class A stations.

Figure 3 is a map indicating that the proposed digital allotment facility will replicate the currently licensed analog operation. The contours shown on the map are the dipole-adjusted contour for each facility

LPTV Impact

The proposed Rulemaking will only impact one LPTV station. Station WAWA-LP on channel 14 at Syracuse, NY will ultimately be displaced by the proposed WSPX-DT allotment. The FCC classifies low-power television stations as secondary services and thus vulnerable to displacement.

Canadian Allocation Analysis

As the proposal is located in the U.S./Canada border zone (within 400 km), Canadian allocation study was conducted to confirm compliance with the Canadian Letter of Understanding (LOU). For purposes of the LOU, the proposed WSPX DTV allotment (125 kW/361 m) is considered as Class VU. A separation study indicates that the proposed Channel 14 DTV allotment meets the minimum separation requirements to all Canadian allotments except for TV-14 at Ottawa, Ontario and DTV-14 at Barry's Bay, Ontario. The proposal is **16** kilometers "short" of the minimum required separation distance of 252 kilometers (UHF, Class VU to Class C) for TV-14, Ottawa. The proposal is 69 kilometers "short" of the minimum required separation distance of 344 kilometers (UHF, Class VU to Class B) for DTV-14, Barry's Bay.

Longley-Rice studies (using a **2 km** grid spacing) and the interference standards contained in the Letter of Understanding (LOU) indicate that **no interference**, in terms of population, will be caused to either Canadian allotment (see Figure 4).

Therefore, it is proposed to assign the following specifications for WSPX-DT's digital channel operation:

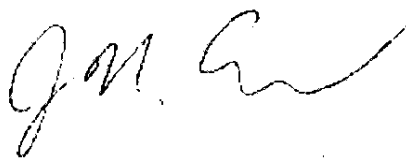
State & City	DTV Channel	DTV ERP (kW)	Antenna Radiation Center	Antenna HAAT (m)
NY, Syracuse	14	125 kW	508 m AMSL	361 m

It is also proposed to amend the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, as follows:

Channel No.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Syracuse, NY	17, 19, *25c, 44c, 47, 54	14, 17, 19 *25c, 44c , 47, 54

This instant Rulemaking petition is not contingent upon any pending or future application for construction permit for any facility.

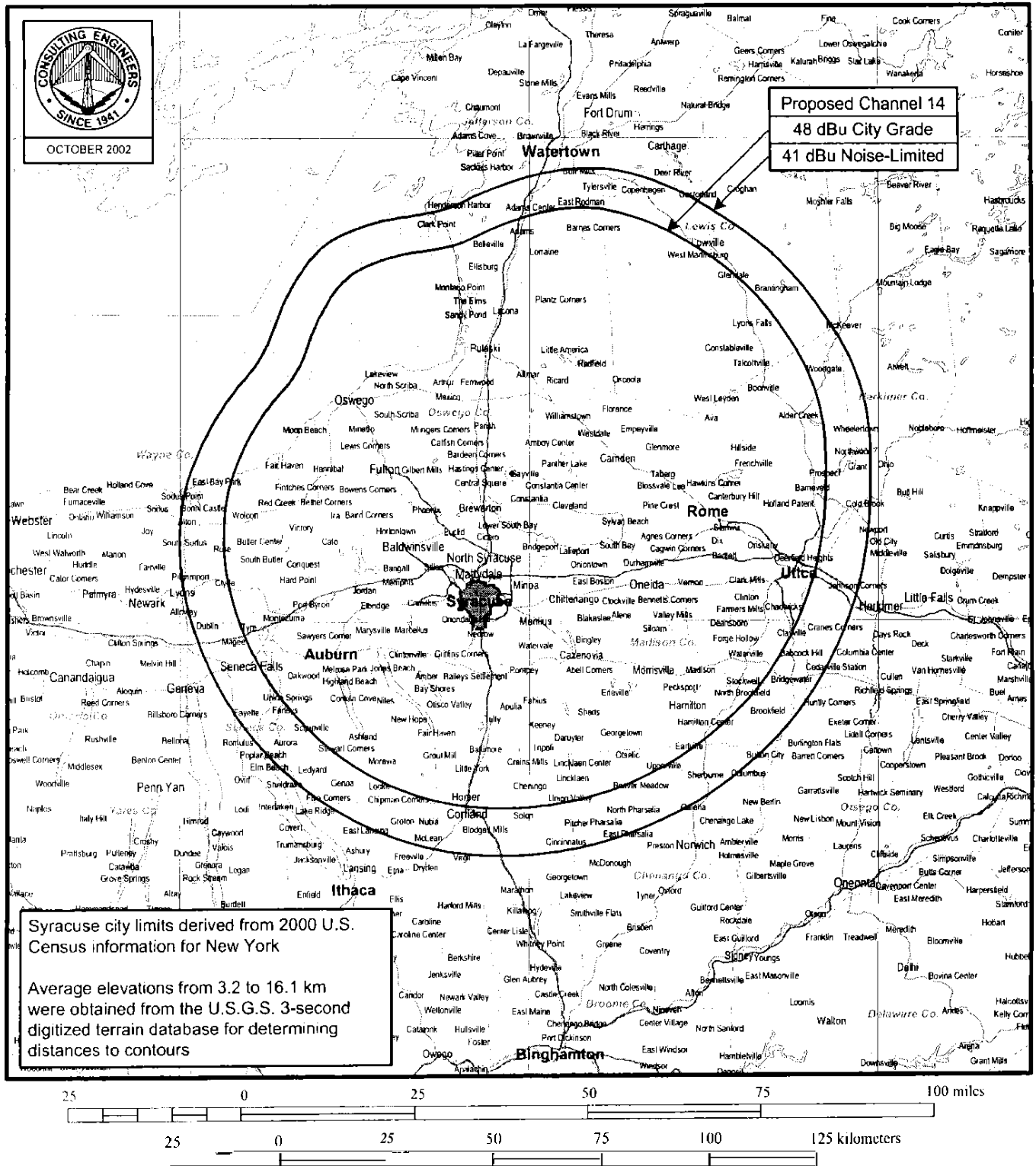


Jonathan N. Edwards

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

October 30, 2002

Figure 1



PREDICTED F(50,90) COVERAGE CONTOURS

STATION WSPX-DT

SYRACUSE, NEW YORK

CH 14 125 KW (MAX-DA) 361 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

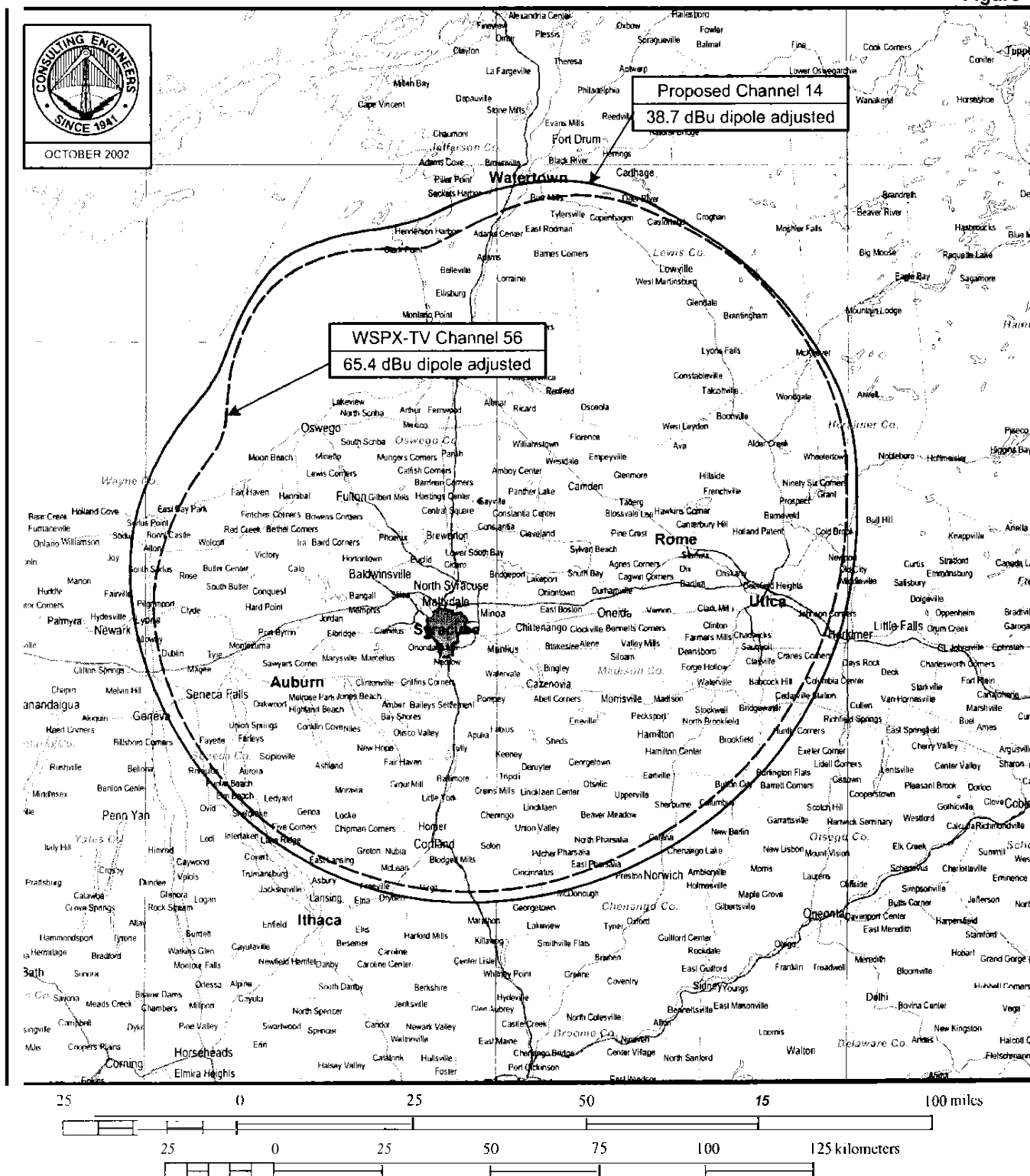
Figure 2

TECHNICAL EXHIBIT
 PREPARED IN SUPPORT OF
 PETITION FOR RULEMAKING TO
 MODIFY THE DTV ALLOTMENT TABLE
 STATION WSPX-DT
 SYRACUSE, NEW YORK

Summary of Channel 14 OET-69 Allocation Analysis

Facility	Channel	Baseline Service Population (1990)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
BPCT-19870331LW Bath, NY	14	Pending Application - Ignored (see explanation attached elsewhere to this filing)		
WUTV-DT, App Buffalo, NY	14	1,322,558	21,797	1.6
WUTV-DT, Allot. Buffalo, NY	14	1,322,558	101	0.0
WPTZ-DT, App North Pole, NY	14	439,869	535	0.1
WPTZ-DT, Allot. North Pole, NY	14	439,869	1,790	0.4
WPBS-TV, Lic Watertown, NY	16	218,946	1,159	0.5
WXXI-TV, Lic Rochester, NY	21	No Interference Predicted		

Figure



REPLICATION COVERAGE MAP

STATION WSPX-DT
SYRACUSE, NEW YORK
CH 14 125 KW (MAX-DA) 361 M
du Treil, Lundin & Rackley, Inc Sarasota, Florida

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULEMAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION WSPX-DT
SYRACUSE, NEW YORK

Interference Caused to Canadian TV-14 & DTV-14 from Proposed WSPX-DT on Channel 14

CANADIAN INTERFERENCE CAUSED

CELL SIZE : 2.00

Using DTV->DTV service params

Using circles for service area

NTSC-ALT 45-25-00 75-42-00 14(0) 1000.0 kW 377.8 m AMSL 50.0 % 64.0 dBu

OTTAWA

ON

CANTAB

CLASS C

Calculated RCMSL with HAAT of 300

%loc = 50.00 %time = 50.00

	Area	Pop
within Noise Limited Contour	15429.64	1156234
not affected by terrain losses	13576.96	1147009

WSPXDP 43-18-18 76-03-00 14 125.0 kW-DA 508.4 m AMSL 10.0 % 39.0

SYRACUSE

NY

0.89 0.91 0.92 0.94 0.97 1.00 0.99 0.94 0.87 0.77 0.68 0.59

0.50 0.39 0.28 0.20 0.18 0.23 0.26 0.23 0.18 0.19 0.28 0.39

0.50 0.60 0.69 0.78 0.87 0.95 0.99 1.00 0.98 0.94 0.92 0.90

(305.0 1.00) (306.0 1.00) (307.0 1.00) (308.0 1.00)

Ref Az: 140.0

D/U Baseline: 33.80

%loc = 50.00 %time = 10

	Area	Pop
Interference	0 (sq km)	0 (0.0%)

DTV-ALT 45-29-00 77-41-00 14(0) 4.0 kW 491.6 m AMSL 90.0 % 39.0 dBu

BARRY'S BAY(39)

ON

CANTAB

CLASS B

Calculated RCMSL with HAAT of 150

%loc = 90.00 %time = 90.00

	Area	Pop
within Noise Limited Contour	6322.835	16558
not affected by terrain losses	3852.853	11589

WSPXDP 43-18-18 76-03-00 14 125.0 kW-DA 508.4 m AMSL 10.0 % 39.0

SYRACUSE

NY

0.89 0.91 0.92 0.94 0.97 1.00 0.99 0.94 0.87 0.77 0.68 0.59

0.50 0.39 0.28 0.20 0.18 0.23 0.26 0.23 0.18 0.19 0.28 0.39

0.50 0.60 0.69 0.78 0.87 0.95 0.99 1.00 0.98 0.94 0.92 0.90

(305.0 1.00) (306.0 1.00) (307.0 1.00) (308.0 1.00)

Ref Az: 140.0

D/U Baseline: 19.50

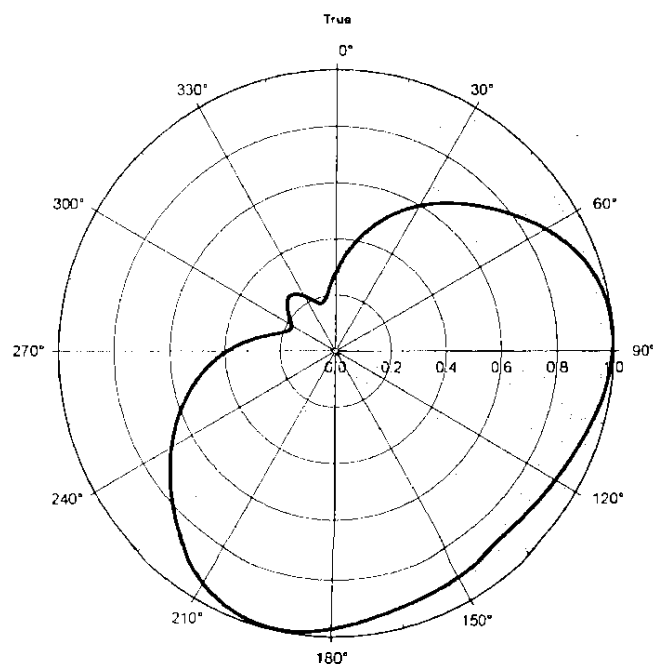
%loc = 10.00 %time = 10

	Area	Pop
Interference	279.77 (sq km)	0 (0.0%)

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULEMAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION WSPX-DT
SYRACUSE, NEW YORK

Proposed Directional Antenna Tabulation for
WSPX-DT on Channel 14

Bearing (°True)	Relative Field		Bearing (°True)	Relative Field
0	0.278		190	0.995
10	0.393		200	0.985
20	0.502		210	0.940
30	0.599		220	0.865
40	0.688		230	0.775
50	0.778		240	0.684
60	0.873		250	0.593
70	0.951		260	0.497
80	0.993		270	0.392
90	0.998		280	0.280
100	0.976		290	0.197
110	0.944		300	0.184
120	0.918		310	0.226
130	0.901		320	0.257
140	0.895		330	0.227
150	0.908		340	0.183
160	0.921		350	0.194
170	0.942			
180	0.974			
		Extra Bearings	'86	1.000



Proposed Directional Antenna Pattern
Dielectric TFU-16DSB-M Pattern Orientated at 140° True